

United States Courts
Southern District of Texas
FILED

August 12, 2020

David J. Bradley, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

V.

**QUSAY WALEED TAHA TAHA
Defendant.**

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4:20-CR-348
CRIMINAL NO.: _____

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Material False Statement in Connection with the Purchase of Firearms)

On or about February 14, 2019, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

QUSAY WALEED TAHA TAHA,

in connection with the acquisition of a firearms, as defined in Title 18 United States Code, Section 921, from Texas Tactical Guns and Range, Spring, Texas, a federally licensed firearms dealer knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented on the Form 4473 that he was the actual purchaser of the firearms, when in truth and in fact he was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

(Material False Statement in Connection with the Purchase of Firearms)

From on or about February 15, 2019 to on or about April 22, 2019, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

QUSAY WALEED TAHA TAHA,

in connection with the acquisition of a firearms, as defined in Title 18 United States Code, Section 921, from CC Plus II, Inc., Conroe, Texas, a federally licensed firearms dealer knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented on the Form 4473 that he was the actual purchaser of the firearms, when in truth and in fact he was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT THREE

(Material False Statement in Connection with the Purchase of Firearms)

On or about March 16, 2019, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

QUSAY WALEED TAHA TAHA,

in connection with the acquisition of a firearms, as defined in Title 18 United States Code, Section 921, from AJC Sports Inc., Clute, Texas, a federally licensed firearms dealer knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of

such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented on the Form 4473 that he was the actual purchaser of the firearms, when in truth and in fact he was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FOUR

(Material False Statement in Connection with the Purchase of Firearms)

On or about July 17, 2019, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

QUSAY WALEED TAHA TAHA,

in connection with the acquisition of a firearms, as defined in Title 18 United States Code, Section 921, from Ally Outfitters Inc., d/b/a Ally Outfitters, Midland, Texas, a federally licensed firearms dealer knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented on the Form 4473 that he was the actual purchaser of the firearms, when in truth and in fact he was not.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FIVE

(Making a False Statement on an ATF 4473 Form)

From on or about July 11, 2018 to on or about November 30, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

QUSAY WALEED TAHA TAHA,

knowingly made a false statement and representation to IIA-SGA, Inc. d/b/a Spring Guns and Ammo II, a licensed dealer under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of IIA-SGA, Inc. d/b/a Spring Guns and Ammo II, in that the defendant stated that he was the actual purchaser of the firearms when in truth and in fact he was not.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT SIX

(Making a False Statement on an ATF 4473 Form)

From on or about March 16, 2019 to on or about August 17, 2019, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

QUSAY WALEED TAHA TAHA,

knowingly made a false statement and representation to Texas Tactical Gear & Firearms, INC. d/b/a Guns Unlimited, a licensed dealer under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Texas Tactical Gear & Firearms, INC. d/b/a Guns Unlimited, in that the defendant stated that he was the actual purchaser of the firearms when in truth and in fact he was not.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT SEVEN

(Dealing in Firearms Without a License)

From on or about July 11, 2018 to on or about July 21, 2020, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

QUSAY WALEED TAHA TAHA,

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

A TRUE BILL

Original Signature on File

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
United States Attorney
Southern District of Texas

A handwritten signature in black ink, appearing to read 'STEVEN T. SCHAMMEL', written over a horizontal line.

STEVEN T. SCHAMMEL
Assistant United States Attorney